

OMEGA CHEMICAL SITE ORGANIZED GROUP

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August 19, 2002

Nancy Riveland-Har
USEPA Project Manager
United States Environmental Protection Agency
Region IX
75 Hawthorne Street
San Francisco, CA 94105

Re: USEPA/OPOG Technical Meeting Minutes, Omega Site

Dear Nancy:

On July 30, 2002, USEPA staff (PM Nancy Riveland-Har and toxicologist Dr. Stan Smucker), Weston Engineering staff (PM Carol Yuge and Bill Clarke) met with CDM staff (Dave Chamberlin, Sharon Wallin and Jim Lavelle), Greg Taylor of Raytheon representing OPOG, and the project coordinator, Chuck McLaughlin, to discuss EPA's comments dated July 29, 2002, to two documents (On-Site Soils RI/FS Work Plan and Sampling and Analysis Plan Addendum) prepared by CDM. Also on the agenda was a discussion of the overall status of the Omega Chemical project and the status of EPA's downgradient groundwater investigation. The following is a brief summary of the items discussed and agreements reached during the meeting.

On-Site Soils RI/FS Work Plan

The On-Site Soils (OSS) Work Plan was submitted to USEPA on February 14, 2002; USEPA provided comments in correspondence dated May 8, 2002; CDM provided a Response to Comments (RTC) to USEPA on June 10, 2002; and USEPA provided comments to the RTC in correspondence dated July 29, 2002. The July 29th correspondence indicated that the majority of USEPA's comments were adequately addressed in the RTC, however, several key issues were still outstanding..

The following comments to the OSS Work Plan were discussed during the July 30, 2002 meeting.

- OPOG will perform a Baseline Risk Assessment (BRA) based on empirical data collected for site soils, ambient air, soil gas and indoor air, from both on-site and off-site locations. The BRA will only be completed after validated data from the proposed field effort are

available. The BRA will be considered the "Screening Risk Assessment" referenced in the consent order. Once fully validated data are available, OPOG will have 90 days to submit a draft BRA to USEPA.

- The BRA will focus on potentially complete exposure pathways as defined by the data for both the current situation and for possible future exposures.
- On-site exposures will be evaluated for commercial/industrial land use. Hypothetical future residential exposures and risks will be quantified, to the extent possible, in an appendix to the BRA.
- USEPA will assist OPOG in gaining access to the former Cal-Air facility and other locations where indoor air, flux chamber and/or soil gas sampling will be necessary to support the risk assessment. Greg Taylor suggested the use of an industrial hygienist to assist with the selection of appropriate indoor air sampling locations and sampling times.
- Extent of contamination will be initially defined by PRGs for residential soils for the risk assessment. If additional extent characterization is necessary for remedy design and/or implementation, a second phase of sampling will be conducted. Such sampling could occur in the RD phase of the project (i.e., may not be necessary prior to a ROD).
- No additional "purposive" sampling, beyond that proposed in the On-Site Soils RI/FS Work Plan, will be required. The current grid sampling for soils will be sufficient to support the BRA.
- Data collected from flux chambers can be used as one means to estimate possible migration of soil gas to the soil surface. In USEPA's experience, Dr. Chuck Schmidt is very well qualified to conduct the flux chamber sampling. Dr. Smucker is comfortable with the use of Dr. Chuck Schmidt as a subconsultant to collect flux chamber samples.
- The BRA will use CalEPA toxicity values whenever these are more stringent than those taken from IRIS or HEAST.
- The BRA will use 1/8th acre as an exposure unit.
- CDM will perform data validation on results for 5 samples from each media, or 10% of the sample results for each media, whichever is greater.

Sampling and Analysis Plan Addendum for Additional Data Collection in the Phase 1a Area

The draft Sampling and Analysis Plan (SAP) Addendum was submitted to USEPA on May 31, 2002; USEPA provided comments in correspondence dated July 29, 2002.

Due to time constraints, there was no opportunity to discuss USEPA comments to the draft SAP Addendum. CDM commented that, based on a brief review of the recently-received correspondence, the comments appeared straightforward and should not be difficult to address.

As agreed with USEPA, redline-strikeout change-out pages for both the OSS Work Plan and SAP Addendum will be submitted for USEPA review and approval prior to finalizing both documents. Change-out pages for both documents will be submitted to USEPA for review by August 29, 2002.

Status of USEPA Regional Groundwater Investigation

USEPA will perform additional field work (in-situ groundwater sampling and analysis) at additional locations downgradient of the Omega site starting August 4th

In order to accommodate Weston staffing concerns, USEPA would like OPOG to consider delaying proposed semi-annual sampling one week from August 20th to August 27th. (Note: CDM re-scheduled the groundwater sampling, however, Weston was able to obtain a second drill rig and a delay is no longer necessary. The sampling has been re-scheduled for August 20 through 22).

Miscellaneous Topics

The new tenants (Star City Auto Body occupying the western lot and warehouse, and SE C&I Electric occupying the interior lot) were unaware of USEPA's proposed field work and the upcoming OSS investigation by CDM, and are very unhappy with Mr. O'Meara. They will cooperate with USEPA and CDM, and we will have to closely coordinate our activities with the tenants in order to minimize disturbing their operations. Chuck McLaughlin inquired whether Dennis O'Meara has been submitting Monthly Access Order Compliance (MAOC) Reports as required and reminded in a June 20, 2002 USEPA letter. Nancy Riveland-Har, USEPA stated that the reports are due to USEPA no later than the 10th of each month and O'Meara has not submitted the reports for several months.

Nancy Riveland-Har informed the group that USEPA will hold an informal meeting for the newly noticed PRPs on Tuesday, September 17, 2002 at the Sheraton Gateway (LAX) commencing at 1:00 PM. The OPOG members will be afforded an opportunity to address this new set of PRPs later that afternoon.

Chuck McLaughlin will submit a revised Gantt Chart schedule describing the OSS and groundwater project tasks for the remainder of 2002 and 2003 to USEPA. The OSS field program will likely be implemented late-September/early-October 2002, and USEPA will have staff on-site for oversight purposes. Actual timing of the tasks will depend on USEPA review and approval of the project materials.

Should you have any questions regarding the above, please feel free to contact me at 909-222-0387

Sincerely,

OPOG

A handwritten signature in black ink, appearing to read "Chuck McLaughlin", with a stylized flourish at the end.

Chuck McLaughlin
Project Coordinator